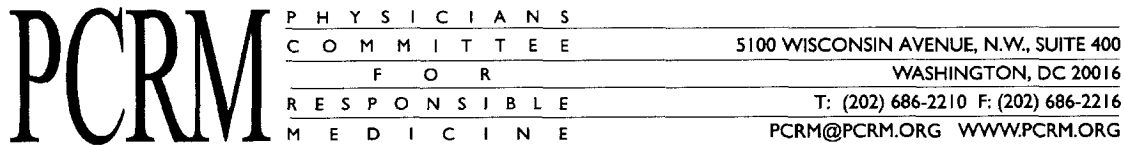


201-15492



August 11, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Subject: Comments on the HPV test plan for Monomethylformamide

Dear Administrator Leavitt:

The following comments on the DuPont test plan for Monomethylformamide (MMF) are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

DuPont submitted its test plan on March 30, 2004 for the chemical MMF (CAS RN 123-39-7). The test plan describes in some detail the uses and human exposure patterns for MMF as well as the known metabolic pathways, which are helpful indeed when attempting to characterize the risk a chemical might pose to human health. Existing data fulfills most of the OECD SIDS data endpoints required by the program, and no new animal testing is proposed. Endpoints for which there is no data is available are fulfilled by using data from a close chemical analog, dimethylformamide (DMF, CAS RN 68-12-2). The chemicals differ only by a single methyl group moiety, and have similar physicochemical, toxicological, and metabolic profiles, according to the test plan.

This particular test plan is an example of the thorough research that is needed to be consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to toxicology. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 335, or via e-mail at kstoick@pcrm.org.

Sincerely,

Kristie M Stoick, M.P.H.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research